LAW OFFICES OF NOLAN KLEIN, P.A.

ATTORNEYS & COUNSELORS

112 W. 34TH STREET, SUITE 1800 NEW YORK, NY 10120 PH: (646) 560-3230

633 S. ANDREWS AVE., SUITE 500 FORT LAUDERDALE, FL 33301 PH: (954) 745-0588

www.nklegal.com

Nolan Klein, Esq. klein@nklegal.com

May 17, 2022

VIA CM/ECF

Honorable Judge Lorna G. Schofield Southern District of New York 500 Pearl Street New York, NY 10007

> Re: <u>Juscinska v. 60 Up, LLC, et al.</u> SDNY Case No.: 1:22-cv-01549

Dear Judge Schofield:

This office represents the Plaintiff, Natalia Juscinska, in the above-captioned case. An initial pre-trial conference is scheduled for May 25, 2022 at 4:30 p.m.

The parties' case management plan is due May 18, 2022. To date, Defendants have not made an appearance, and the time for Defendants to answer or otherwise move has expired. As such, Plaintiff respectfully requests that this Court adjourn the conference *sine die* to allow Plaintiff time to move for default against Defendants. This is our third request for an adjournment of this conference, and the request will not prejudice any parties or affect any other scheduled dates.

We thank the Court for your time and consideration in this matter.

Respectfully Submitted,

Law Offices of Nolan Klein, P.A.

NKK/amd

By: <u>/s/ Nolan Klein</u> NOLAN KLEIN (NK4223)

The application is **GRANTED**. The initial pretrial conference scheduled for May 25, 2022, is **adjourned sine die**. By **May 25, 2022**, Plaintiff shall move for default pursuant to Attachment A of the court's Individual Rules. The Clerk of Court is respectfully directed to close the motion at Docket No. 14.

Dated: May 18, 2022

New York, New York

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE